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11 **UNITED STATES DISTRICT COURT**
12 **NORTHERN DISTRICT OF CALIFORNIA**
13 **SAN JOSE DIVISION**
14

15 IN RE HIGH-TECH EMPLOYEE
16 ANTITRUST LITIGATION

17 THIS DOCUMENT RELATES TO:
18 ALL ACTIONS
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Master Docket No. 11-CV-2509-LHK

**DECLARATION OF CHRISTINA
BROWN REGARDING APPLE INC.'S
DOCUMENT AND DATA
PRODUCTIONS**

1 I, Christina Brown, declare as follows:

2 1. I am a member of the Bar of the State of California and a counsel of the law firm
3 of O'Melveny & Myers LLP, attorneys for Defendant Apple Inc. ("Apple"). I submit this
4 declaration as directed by the Court's Further Case Management Order of June 5, 2012 (Dkt.
5 148), regarding Apple's productions of documents and data. I have personal knowledge of the
6 facts set forth in this declaration and, if called to testify as a witness, could and would do so
7 competently.

8 2. Apple has met the June 15, 2012 deadline for substantial completion of rolling
9 production of documents, as follows:

10 a. Apple has produced to Plaintiffs all documents that Apple produced to the
11 United States Department of Justice in connection with *United States v. Adobe Systems, Inc.*
12 Apple produced the majority of these documents on November 30, 2011, and withheld a small
13 number of the documents in order to honor its obligations with respect to confidential information
14 belonging to third parties. Apple produced these remaining documents on January 18, 2012.

15 b. Apple has completed its production of data in response to Plaintiffs' data
16 requests in accordance with the deadlines established by the Court. Apple produced its personnel
17 data, including compensation data, on May 3, 2012. Apple produced data regarding employee
18 stock options, along with recruiting data, from its third party databases on May 9, 2012. In all,
19 Apple has produced data for tens of thousands of employees over an eleven-year period.

20 c. Apple has completed its production of responsive, "high-level" documents
21 identified through employee interviews.

22 d. In addition, Apple has completed its search for documents for all eighteen
23 custodians from whom Apple agreed to produce documents. In this process, Apple has reviewed
24 more than 250,000 documents and produced approximately 21,000 documents. While Apple
25 believes it has completed a reasonable search of all relevant data sources for the eighteen
26 custodians, it is evaluating whether further searching is required for one custodian. Pursuant to
27 the parties' agreement, Apple will produce its privilege log by July 16, 2012.
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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct. Executed this 18th day of June 2012 in San Francisco, California.

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4 By: /s/ Christina J. Brown
Christina J. Brown